UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Cr. No. 21-173 (WMW/DTS)

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	STATEMENT OF FACTS IN
v.)	SUPPORT OF EXCLUSION OF
)	TIME UNDER SPEEDY TRIAL ACT
GISELA CASTRO MEDINA (2),)	
)	
Defendant.)	

Pursuant to 18 U.S.C. § 3161(h)(7)(A), I, the defendant in this case, agree to the following statement of facts in support of the defense Joint Motion to Exclude Time Under the Speedy Trial Act:

I understand the government's discovery deadline is September 30, 2021, and my attorneys have been told by the government that the discovery is voluminous. My attorneys will need sufficient time to review the discovery, communicate with me, and draft motions to be filed. Accordingly, I wish for there to be a one-month extension of the date to file motions by and a corresponding extension of the motions hearing and trial dates.

The defense requests a continuance of the date to file motions by to and including November 15, 2021. Based on the above facts, I request that the period from now until that date be excluded from the time in which I would otherwise have to be brought to a trial on this case. I have discussed this matter with my attorneys and voluntarily make this request, with full knowledge of my rights under the Speedy Trial Act.

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Dated: 19/30/21

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Ryan Garry
Elizabeth Duel
Attorneys for Defendant